

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of
Telecommunications and Energy on its own
Motion pursuant to G.L. c. 159, §§ 12 and 16,
into the collocation security policies of Verizon
New England Inc. d/b/a Verizon Massachusetts

DTE 02-8

**FIRST SET OF INFORMATION REQUESTS SUBMITTED BY
AT&T COMMUNICATIONS OF NEW ENGLAND, INC.**

Pursuant to the June 13, 2002, Memorandum of the Hearing Officer in this docket, AT&T hereby submits the following information requests to Verizon-MA.

Instructions.

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. Please provide answers as they are completed.
3. These requests shall be deemed continuing so as to require supplemental responses if Verizon-MA subsequently receives or becomes aware of additional information responsive to these requests.
4. If an answer refers to Verizon-MA's response to another information request in this proceeding, please provide that response with the answer.
5. If Verizon-MA cannot answer a request in full, answer to the extent possible and state why Verizon-MA cannot answer the request in full.
6. If Verizon-MA refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

Information Requests.

- 1) This request refers to page 28 of Verizon's Panel Surrebuttal Testimony, the testimony written in response to the question "Please describe AT&T's security procedures."
 - a) Please provide all the documentation relied upon for the preparation of the response in Verizon's testimony, including any documentation provided by AT&T to Verizon.
 - b) Please identify the person(s) by name and position responsible for providing the information upon which the response is based.
 - c) Please identify by address and location within Massachusetts which AT&T facilities are subject to the procedures described in Verizon's testimony. If there are no AT&T facilities in Massachusetts to which the described security procedures apply, please so state.

Respectfully submitted,

**AT&T COMMUNICATIONS OF
NEW ENGLAND, INC.**

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